

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

JARROD STRINGER, et al.,)	
Plaintiffs,)	
)	
v.)	NO. SA-20-CV-46-OG
)	
RUTH R. HUGHS, et al.,)	
Defendants.)	

ORAL AND VIDEO DEPOSITION

JARROD STRINGER

APRIL 29, 2020

(TAKEN REMOTELY)

ORAL AND VIDEO DEPOSITION OF JARROD STRINGER,
produced as a witness at the instance of the Defendants
and duly sworn, was taken in the above-styled and
numbered cause on the 29th day of April, 2020, from
10:04 a.m. to 11:01 a.m., before Dana Richardson,
Certified Shorthand Reporter in and for the State of
Texas, reported by computerized stenotype machine at the
residence of Jarrod Stringer, 2401 Lazy Hollow Drive,
Apartment 130-A, Houston, Texas 77063, pursuant to the
Federal Rules of Civil Procedure, the First Emergency
Order Regarding the COVID-19 State of Disaster,
paragraphs 2.b and c, and the provisions stated on the
record or attached hereto.

APPEARANCES

FOR PLAINTIFFS:

Ms. Rebecca Harrison Stevens - (via webconference)
AND
Mr. Joaquin Gonzalez - (via webconference)
TEXAS CIVIL RIGHTS PROJECT
1405 Montopolis Drive
Austin, Texas 78741
Telephone: (512) 474-5073
E-mail: beth@texascivilrightsproject.org

FOR DEFENDANTS:

Mr. Christopher D. Hilton - (via webconference)
AND
Mr. Anne Marie Mackin - (via webconference)
ASSISTANT ATTORNEYS GENERAL
P.O. Box 12548, Capitol Station
Austin, Texas 78711-2548
Telephone: (512) 463-2798
E-mail: christopher.hilton@oag.texas.gov

ALSO PRESENT:

Mr. Brian Christopher, Video Technician
(via webconference)

INDEX

PAGE

JARROD STRINGER

Examination by Mr. Hilton - via webconference5
Signature Page43
Court Reporter's Certificate44

EXHIBITS

EXHIBIT	DESCRIPTION	PAGE
Exhibit 1	Defendants' Notice of Oral Deposition of Jarrod Stringer	7
Exhibit 2	Plaintiffs' Original Complaint	20
Exhibit 3	Texas Driver's License web page printout, txapps.texas.gov, 11 pages	30
Exhibit 4	Declaration of Jarrod Stringer, with "Exhibit 24" cover page, Appendix 177 through 180	34

1 THE REPORTER: We're on the record.
2 Today's date is April 29, 2020. The time is 10:04 a.m.

3 This is the oral deposition of Jarrod
4 Stringer in the matter of Jarrod Stringer, et al., verse
5 Ruth Hughs, et al., and it is being conducted remotely
6 in accordance with the First Emergency Order Regarding
7 the COVID-19 State of Disaster, Paragraphs 2.b and c.

8 The witness is located at the residence of
9 himself, 2401 Lazy Hollow Drive, Apartment 130-A,
10 Houston, Texas 77063.

11 My name is Dana Richardson, Texas
12 Certified Shorthand Reporter No. 5386. I'm
13 administering the oath and reporting the deposition
14 remotely by stenographic means from my residence within
15 the state of Texas. My business address is P.O.
16 Box 245, Manchaca, Texas 78652.

17 The witness has been identified to me
18 through his affirmation; and if you would, sir, please
19 raise your right hand to be sworn.

20 (Witness sworn)

21 THE REPORTER: Counsel, please, beginning
22 with Plaintiff counsel, state your appearance and
23 location for the record.

24 MS. STEVENS: Sure. Beth Stevens on
25 behalf of the plaintiffs. I am in Austin, Texas, Travis

1 County.

2 MR. HILTON: Chris Hilton, the Attorney
3 General's Office for the defendants, also in Austin,
4 Texas, in Travis County.

5 THE REPORTER: Please proceed. Thank you.

6 JARROD STRINGER,
7 having been first duly sworn, testified as follows:

8 EXAMINATION - (via webconference)

9 Q. (BY MR. HILTON) All right. Good morning,
10 Mr. Stringer.

11 A. Good morning.

12 Q. Can I please have you state and spell your name
13 one more time for the record?

14 A. Sure. Jarrod, J-a-r-r-o-d. Stringer,
15 S-t-r-i-n-g-e-r.

16 Q. Thank you, sir. I just want to start, if you
17 could just tell me in your own words what your case is
18 about.

19 A. My case is about when I have changed my address
20 with the driver's license -- on my driver's license,
21 trying to then get that to update my voter registration
22 and what that entails.

23 Q. And what are you hoping to accomplish with your
24 lawsuit?

25 A. I am hoping to simply state that when I have

1 changed my address through the State on my driver's
2 license that my voter's registration, when I change
3 counties, is not automatically updated. So I would hope
4 that that process could change where it is updated
5 automatically.

6 Q. All right. I want to talk about today's
7 deposition a little bit, and I want to start by testing
8 the means of getting exhibits to you, which is a little
9 bit tricky --

10 A. Okay.

11 Q. -- since we're having to do this remotely
12 unfortunately.

13 A. Sure.

14 Q. So there's two different ways I can do it. I
15 can pull up my exhibits on the screen and you can just
16 see them as we're talking about them, or I can send you
17 the file through the group chat and then you can have
18 the file, you know, in front of you on your computer and
19 you can kind of manipulate it and look through the
20 documents yourself as opposed to telling me to scroll
21 up, zoom in, zoom out, you know, things like that. So
22 which do you think would be easier for you --

23 A. If they're scroll --

24 Q. -- would you prefer to have --

25 A. Yeah, if they're scrolling, just send it to

1 me --

2 THE REPORTER: One at a time. I'm sorry,
3 back up and let's finish the question. Thanks.

4 MR. HILTON: Sorry.

5 Q. (BY MR. HILTON) So the question was: Which of
6 those methods sounds easier for you to do today?

7 A. If they're scrolling up and down, sending me
8 the document would probably be easier.

9 Q. All right. Well, let's give it a shot. I'm
10 going to send you what will be Exhibit 1 to the
11 deposition, and I just sent it out through the group
12 chat through the Zoom program. Let me know if you're
13 able to access that file and when you have it in front
14 of you.

15 A. Just a second. It's loading.

16 Okay. It's loaded.

17 (Exhibit 1 marked)

18 Q. (BY MR. HILTON) All right. So you have
19 Exhibit 1 in front of you?

20 A. Yes, sir.

21 Q. And I should ask, too: Do you have any other
22 documents with you during this deposition or any other
23 files open on your computer that you're referring to?

24 A. No, sir.

25 Q. Okay. I'll ask that you only refer to the

1 exhibits that I send out through the chat feature on
2 Zoom. If you do look at any other document, please just
3 let me know.

4 A. Yes, sir, I will.

5 Q. Okay. So turning to Exhibit 1, do you
6 recognize Exhibit 1?

7 A. Yes.

8 Q. And what is it?

9 A. It's the defendant's notice. I don't -- I'm
10 not very good with my legal terms, to be honest.

11 Q. That's all right. It's -- it's the deposition
12 notice that we -- we sent to your counsel. It's the
13 reason why -- why you're here today on Zoom with us. Is
14 that right?

15 A. Yes, sir. Yes, sir.

16 Q. Okay. All right. Well, that's Exhibit 1 down.
17 Only a couple more to go as a successful task so --

18 A. Okay. Great.

19 Q. And what did you do to prepare for the
20 deposition today?

21 A. Met with my attorney.

22 Q. When did you meet with your attorney?

23 A. A week before last, I think. I can't remember
24 exactly.

25 Q. And for how long?

1 A. 30 to 45 minutes, maybe.

2 Q. And I don't want to know the content of any of
3 those discussions, but who -- who all was at the
4 meeting? Or on the phone?

5 A. Sure. Myself -- myself and Beth Stevens, as
6 best I recall.

7 Q. Did you review any documents to prepare for the
8 deposition today?

9 A. No.

10 Q. All right. We've got that kind of formality
11 stuff out of the way.

12 So I guess I want to just know a little
13 bit about you and about your background. So what --
14 what -- are you employed? If so, what's your
15 profession?

16 A. Sure. I am employed. I work for a consulting
17 company called psyML, p-s-y-M-L; and it stands for
18 psychology and machine learning. And we develop
19 empathetic artificial intelligence. I am the content
20 writer for psyML. I've been working there three and a
21 half years.

22 Q. It sounds like interesting work. Do you find
23 it interesting?

24 A. I love it, yeah. It's wonderful. We're
25 actually developing models of personality assessment

1 that actually are based on scientifically validated
2 studies, and they are an attempt to help people grow in
3 their own lives in ways that already fit the way that
4 we're kind of evolutionarily designed.

5 Q. That's very -- I have a good friend who does
6 machine learning kind of stuff. So it's -- I'm just
7 very interested in the area. What is -- what is
8 content? You said content writer is your specific role?

9 A. Sure. Yeah. My -- I am -- my background is
10 in -- I taught English for 15 years, and I've worked
11 kind of variety of different industries and had a lot of
12 different educational backgrounds. And so I actually
13 develop -- so there are, in -- in our personality
14 development, we -- there are 12 basic personality types
15 have showed up throughout the course of kind of human
16 beings, development and civilization.

17 Q. Uh-huh.

18 A. And for each of those 12 types. So when we
19 work with companies or organizations and they want to
20 help their clients or they want to help their employees,
21 they have a certain idea of kind of the kinds of things
22 they want to help them with. And so I actually help
23 write the feedback for each of the 12 personality types
24 based on their answers to certain types of questions to
25 help them both see the good that they already are and

1 also kind of grow into whatever more they want to
2 become.

3 Q. I remember in a former life I worked at a big
4 law firm and they made us all take a Myers-Briggs test.

5 A. Uh-huh.

6 Q. And then we all got some feedback based on our
7 Myers-Briggs personality type.

8 A. Uh-huh. Sure.

9 Q. It sounds like what you're doing is -- is,
10 sounds like, a much more sophisticated version of that
11 kind of process and that kind of idea. Is that right?

12 A. Yeah, that's right. Myers-Briggs has been a
13 very common -- for -- it was common for about 25 years,
14 and but the thing about Myers-Briggs is that they
15 created personality types without doing the science
16 first. And so -- and the other thing about it was you
17 were put into, as you know, one of 16 boxes, right?

18 This actually puts you on -- our -- our
19 version actually puts you on a matrix where you can see
20 your most dominant, but you can actually see all six
21 traits, where you fall on the spectrum; and it kind of
22 gives you this kind of interplay that's really kind of
23 neat.

24 Q. Very interesting. And is that the same kind
25 of -- you know, my experience was it was part of a big

1 corporate-style law firm. Is that the kind of client
2 that your company works with? Is that what your work is
3 developed for?

4 A. It varies, and we are actually developing at
5 this point so that we can have our own version that
6 people can access -- in fact, we've developed one for
7 COVID-19 where employers can simply get on our website
8 and have their employees take it. It will tell them
9 what their personality type is, and then it tells them
10 what the four areas of concern during this kind of
11 isolation is and -- and which of those -- how those four
12 areas that each of their employees will -- where they'll
13 need the most care and attention and where they're going
14 to be fine.

15 And so, like, I, for instance, am really
16 high in exploration and so -- and sociability. So for
17 me, it tells my employer, "stay in regular contact," you
18 know, and "make sure they're doing good." In the
19 areas -- other areas, I'm more moderate on. But it has
20 a color code, actually, to tell you kind of how to --
21 how to help them and support them. And we actually --
22 one of my coworkers got a tweet yesterday from somebody
23 saying, "I took your -- I took your test and read the
24 results and they were" -- not only -- she said, "The
25 test was spot on and even more so in terms of how I

1 should deal with this pandemic and isolation."

2 So it was really neat.

3 Q. Very interesting. Thank you for indulging me.

4 It sounds like fascinating work.

5 A. Yeah, absolutely.

6 Q. I appreciate that. You said you taught English

7 for 15 years, I think you said?

8 A. Yes, sir.

9 Q. So do you have a Ph.D. in -- in English related
10 field or?

11 A. I did a Ph.D., and I wrote the dissertation. I
12 spent five years, six years writing it. Unfortunately,
13 I came to find out that it was -- the last part may
14 have -- was probably going to not happen. The committee
15 and I couldn't figure it out together. We tried.

16 Q. I -- that -- those situations are extremely
17 difficult. I've had friends who've gone through similar
18 stuff, and so I know how that goes. But -- but it
19 sounds like your work now is more psychology related.
20 So do you have a psychology background at all or --
21 or --

22 A. Well, I actually work with -- my boss is a
23 Ph.D. in psychology.

24 Q. Oh.

25 A. And he -- he actually developed the logarithms

1 for eharmony. He was the chief science officer at
2 eharmony when they started. And so he is where the buck
3 stops on the psychology. I provide him with content
4 that we've worked together on over the course of three
5 and a half years where that I'm now comfortable with all
6 of the -- my own education, as well educating myself on
7 the writing of that, but he's the one who reviews the
8 content for that particular aspect.

9 Q. Gotcha. Understood. And other than teaching
10 and this current job, have you had any other employment
11 experience?

12 A. Sure. I worked as a contractor for the
13 Air Force. We -- at an outreach of the Pentagon Small
14 Business Office and they had a -- we were, it's called,
15 the Air Force Outreach Program Office. And we actually
16 were the marketing -- kind of the marketing branch for
17 all small business offices in the Air Force across the
18 United States.

19 So we had a -- we had a public access
20 television show. We did a lot of pamphlet publications
21 for individual bases and just kind of a lot of
22 intercommunication. It was really -- it was really a
23 neat experience. I learned a lot of stuff that I didn't
24 know.

25 I also worked as a youth director in an

1 Episcopal church for three years. That was my first job
2 out of college.

3 Those are two of the ones that stick out.

4 Q. Well, I was an English major in undergrad; and
5 I went a very different route. So it sounds like you've
6 had a very interesting and varied -- and varied career.

7 A. It has been interesting. Thank you.

8 Q. Are you married?

9 A. Yes.

10 Q. What's your spouse's occupation?

11 A. She's an attorney.

12 Q. Any particular type of law that she practices?

13 A. Corporate and business.

14 Q. Does she work for a firm or --

15 A. Yes.

16 Q. Okay. Do y'all have any children?

17 A. Two cats. More demanding than children.

18 Q. They certainly can be. It depends on the cat,
19 I think; but if they are, my hats off to you.

20 And I -- I can't imagine they're pleased
21 about you being home all day during the current pandemic
22 and invading their space so --

23 A. It's quite the opposite. They're super needy.

24 Q. Gotcha. Gotcha. Well, that's a better problem
25 to have, I suppose.

1 And so you're currently living in Houston.

2 Is that correct?

3 A. Yes.

4 Q. And have you always lived in Texas?

5 A. I went to graduate school in Tennessee two
6 years in my mid-twenties; and I was in Sewanee,
7 Tennessee. And then as a -- I don't remember it, but I
8 lived in Colorado for, like, three months when I was a
9 little boy, but I don't remember.

10 THE REPORTER: Please repeat. "In
11 Colorado for three months"?

12 A. When I was a little boy. I was a year old.

13 Q. (BY MR. HILTON) How about since you completed
14 your -- your formal education? Have you lived in Texas
15 since then?

16 A. Yes.

17 Q. And where in Texas have you lived?

18 A. I moved back from Tennessee to San Antonio.
19 Then I lived in San Antonio. I moved to Arlington for
20 my doctoral work. And then I moved back to San Antonio
21 so my wife could go to law school at St. Mary's. And
22 then a couple years after graduation from law school,
23 she got a job with a firm in Houston. And my job is
24 mobile; so we moved to Houston.

25 Q. And when did you move to Houston?

1 A. August 24th, 2019.

2 Q. Okay. And I'm going to ask you a few more
3 questions about that in a little bit when we get to some
4 more exhibits. So thank you for all that. I appreciate
5 it.

6 I guess I want to turn back to talk about
7 this lawsuit a little bit more. How did you -- again,
8 without divulging any privileged communications, how did
9 you meet your lawyers in this case?

10 A. I was -- I was contacted -- I don't remember
11 what form of contact it was, but I was contacted by
12 them -- I'm assuming it was over the phone, but I would
13 be guessing.

14 Q. Do you know how they came to contact you?

15 A. Yes. After the 20 -- I believe it was 2014.
16 In 2014 when we moved to San Antonio, as soon as our
17 WIFI got hooked up, I changed my wife and my's address
18 with the driver's license. And that fall, I worked -- I
19 taught at University of Texas at San Antonio; and it was
20 one of the locations that had early voting. And so I
21 went in to early voting, and they told me I wasn't
22 registered.

23 So I called the -- I don't know -- the
24 county or whatever it was. They gave me a number to
25 call. I don't remember -- I called them. They took my

1 name and said I could vote for the state elections on
2 that -- the Tuesday, you know, that everybody votes
3 only, but I couldn't vote for the local election. So
4 apparently they kept a list of those names, and that's
5 where my attorneys got my name.

6 Q. And what -- do you remember, what year was
7 that? And if you remember specifically which election
8 it was, I'd like to know that as well.

9 A. 2014 is -- I'm pretty sure. Let me -- let me
10 make sure that's right. Yeah. That's right. There
11 were local elections and gubernatorial election.

12 Q. And so we're here today for kind of the second
13 iteration of a similar lawsuit. Those events preceded
14 your initial lawsuit. Is that right?

15 A. I'm sorry, could you repeat that?

16 Q. So those events that you just described, that
17 preceded your first lawsuit against -- against my
18 clients. Is that right?

19 A. That was the first lawsuit, yes.

20 Q. And what's your understanding of the outcome of
21 the first lawsuit?

22 A. That's a good question.

23 Q. And I don't want you to tell me, you know, what
24 your attorneys told you. Again, I don't want any
25 privileged information from you today.

1 A. No, I didn't mean --

2 Q. I'd like to know your understanding.

3 A. Sure. Yeah. No.

4 My understanding is that it was appealed
5 and so we are going through it again.

6 Q. What's your understanding, if you have one,
7 about the outcome of that appeal?

8 A. I'm not -- I'm not very articulate on that.

9 Q. So you -- you just don't know? Is that your
10 answer?

11 A. Well, the outcome of the appeal? Could you
12 explain a little bit more what you mean?

13 Q. Well, you said you understood that the case was
14 appealed.

15 A. Yes.

16 Q. Do you know whether that appeal has -- has been
17 resolved?

18 A. Well, if it had been resolved, I wouldn't be in
19 this deposition, right?

20 Q. Well, how about this: We'll just leave that
21 aside; and, you know, I understand that your wife is an
22 attorney. I think -- you know, my wife is not an
23 attorney. She hears me talk about law stuff all the
24 time and I don't think is interested in any of it. So I
25 won't bog down in the details, so the procedural ins and

1 outs of this case.

2 A. Okay. Thank you.

3 Q. I'm going to send you another Exhibit through
4 the chat function on Zoom, what I'll mark as Exhibit 2
5 or what I'll attach as Exhibit 2. Let me know when you
6 have that in front of you.

7 A. Okay. I have it.

8 (Exhibit 2 marked)

9 Q. (BY MR. HILTON) And do you recognize
10 Exhibit 2?

11 A. Yes.

12 Q. And what is it?

13 A. The complaint, Plaintiffs' Original Complaint
14 with my name on it.

15 Q. Did you review this document before it was
16 filed?

17 A. Yes.

18 Q. How much time do you think you spent reviewing
19 it?

20 A. I don't remember.

21 Q. If -- if you had to put a -- an estimate on it,
22 how much time do you think in total you've spent on this
23 case?

24 A. Huh.

25 Q. And let -- and let me be more -- let me be more

1 precise. Starting from, let's say, December 2019 until
2 now, how much time do you think you've spent on this
3 case?

4 A. Four or five hours.

5 Q. Okay. And do you know Nayeli Gomez?

6 A. No.

7 Q. And do you know John Harms?

8 A. No.

9 Q. Are you familiar with Move Texas Civic Fund?

10 A. No, sir.

11 Q. I'm sorry, you -- you cut out a little bit
12 there. The answer was "no"?

13 A. Yes. "No" was the answer.

14 Q. Thank you. And are you familiar with the
15 League of Women Voters of Texas?

16 A. No.

17 Q. So are you currently registered to vote?

18 A. Yes.

19 Q. And when was the last time that you registered
20 to vote?

21 A. So in 2014 after I wasn't able to vote, that
22 following spring I was teaching on the campus of one of
23 the community colleges in San Antonio and they -- there
24 was an actual -- there was a state registrar volunteer,
25 or whatever, for voting walking around. And she had a

1 registration -- had registration cards and that was --
2 and I filled out one of the cards and signed it and
3 became registered in Bexar County at that point. And
4 that was the last time I filled out a registration form.

5 Q. And do you recall any times before that in
6 which you registered yourself to vote?

7 A. I know I registered when I moved to college;
8 and I went to college in Sherman, Texas, at Austin
9 College.

10 Q. Uh-huh.

11 A. Because I -- I voted for the first time at 19.
12 That was Bill Clinton's first election. I remember
13 that. That's back when you had to vote with a pencil.

14 Q. Do you recall any other times that you
15 registered to vote?

16 A. I'm having kind of flashbacks of signing
17 something in the actual driver's license office, but I
18 can't put my finger on exactly what I remember about
19 that. And I don't remember -- and I don't remember the
20 year or anything like that.

21 Q. Sure. Sure. Any other details you remember
22 about that? If no, that's fine. I'm just curious.

23 A. I can't recall. I'm sorry.

24 Q. That's -- that's fine. It's a perfectly
25 acceptable answer as I'm sure -- as I'm sure Beth told

1 you. So that's no problem.

2 And so we were talking about times that
3 you registered to vote. How about times that you voted?
4 When was the last time that you voted?

5 A. I voted this spring.

6 Q. In the March primary?

7 A. Yes, sir.

8 Q. And how about before that?

9 A. Well, in the -- as of two years ago, I can't --
10 I think there was one election that -- that I remember,
11 anyway, wanting to vote, but I was diagnosed with a
12 chronic illness about two years ago, almost exactly.
13 And some days, I just can't even -- couldn't even get
14 out of bed. And I remember being a little frustrated by
15 that. So that would be the last time.

16 Q. Understood. And I can imagine that situations
17 like that must be incredibly frustrating. So I'm sorry
18 that you have to deal with that.

19 A. Oh, thank you.

20 Q. To the extent that you're -- you're able to,
21 since you've, you know, been eligible to vote, would you
22 say that you voted regularly?

23 A. I would not say that I have voted regularly.
24 I -- when I started teaching, I became more aware of the
25 importance and I was getting older, you know, and as you

1 become more mature, I think you become more aware of
2 what's important. And so when I was younger, it was
3 the -- I mean, you know, I wanted to vote when I was 19,
4 but it was also the novelty of finally having the
5 privilege of voting, right? Then as I began to see the
6 world with a bigger lens, it became more important.

7 Q. So how -- do you try to vote in every Federal
8 election?

9 A. Yes.

10 Q. Do you try to vote in every State election?

11 A. Yes.

12 Q. And -- and how about local elections? I know
13 there are lots of different kinds and they tend to kind
14 of sneak up on you sometimes. Do you try to vote in
15 every local election?

16 A. Honestly, it depends. San Antonio is my
17 hometown, and so I've lived there most of my adult life.
18 We moved to Houston in August, as I said, and there was
19 an election shortly after I got here and I actually just
20 happened to frequent one of the community centers where
21 they had early voting, but I -- I don't vote for --
22 in -- for people that I don't know. I'm not a -- I just
23 don't -- that's not the way that I operate.

24 So I didn't -- I didn't feel even -- I
25 didn't feel comfortable going in and voting for a bunch

1 of people that might affect -- might affect their lives,
2 you know, just because some -- some guy wants to, you
3 know, cast a vote just because he has the ability.

4 Q. Understood. Fair enough. Would you consider
5 yourself to be politically active?

6 A. That's an interesting question, Chris. How
7 would you define that?

8 Q. Well, what does that phrase mean to you? I
9 think it can mean different things to different people.
10 So what does someone being political active mean to you?

11 A. Sure. I think politically active simply means
12 trying to be informed about what is going on in public
13 society and taking an interest and caring on
14 particularly different points of view. I mean, as a --
15 my -- the majority of my teaching was in a college
16 setting. And the -- one of my responsibilities that I
17 felt the student was -- especially as an English teacher
18 and a writing teacher was we -- we emphasized the
19 ability to see things from more than one angle. And the
20 first day of class, every -- in every class I taught,
21 pretty much. I can't say this a hundred percent, but
22 pretty much. We talked about the nature of acceptable
23 and unacceptable propaganda. And propaganda, I don't
24 mean that term as a buzz word. I mean it as propaganda
25 as the definition, really. It only offers one point of

1 view.

2 Q. Right.

3 A. And so we -- I have -- I have -- I was taught
4 and I try to pass on to my students that understanding
5 that there are multiple points of view in any scenario
6 is your greatest ally in growing as a person and
7 participating in public discourse for that matter. So
8 social issues were part of the fabric -- are part of the
9 fabric of university writing classes, particularly now.
10 And even when you're teaching literature -- you may have
11 experienced this yourself in literature -- when you can
12 tie the metaphors of literature to something real world,
13 it helps.

14 Q. I think that's a -- an interesting perspective.
15 I think your students were lucky to have you teaching
16 them to think that way.

17 What about other forms of political
18 activity or maybe something like activism, like
19 volunteering for a campaign, you know, going out into
20 public to advocate for an issue, things -- things like
21 that? Have you ever engaged in anything like that over
22 the course of your life?

23 A. Not that I can recall. I have actually wanted
24 to in the last couple of years but, for health reasons,
25 was not able to.

1 Q. Are there any particular political causes or
2 issues that are particularly important to you?

3 A. I think my presence to this case speaks to one
4 of them, which is democratic in terms of all people
5 having access to the -- to vote, you know, as citizens.
6 But I -- I -- I believe that fundamental rights of every
7 human being of our society should be honored.

8 Q. Any other particular political causes or issues
9 that you would say are important to you?

10 A. I genuinely feel that groups that -- any group
11 that is discounted needs to be represented. So I don't
12 really jump on particular issues most -- in most cases.
13 What I tend to do is try to look at where there's a need
14 and try to become more educated about it.

15 Q. I appreciate the self reflection on that. I
16 guess -- I'm looking at my notes here and seeing what I
17 have next. I think it's time, maybe, to turn towards
18 some more concrete topics. I've got a couple more
19 exhibits. I think I'm still on track to get you out of
20 here under an hour.

21 I want to go back to your move from
22 San Antonio to -- to Houston. You mentioned that you
23 made that move because your wife took a job with a law
24 firm. Is that right?

25 A. Yes, sir.

1 Q. And you updated your address on your driver's
2 license?

3 A. Yes. In this case, we switched rolls. My wife
4 was the one who registered us online.

5 Q. And -- and when you did that, did she go
6 through the same process -- well, strike that.

7 After going through that process, did you
8 undertake to -- to register yourself to vote using the
9 process that was described on the online driver license
10 portal?

11 A. I don't know what was described. I didn't
12 register us.

13 Q. Did your wife undertake to register you both to
14 vote using that process?

15 A. I don't know what she filled out, to be honest.

16 Q. So you understood how the process worked
17 generally, given your previous experience and your
18 involvement in this case, true?

19 A. I had not gone --

20 MS. STEVENS: Object to form.

21 A. -- on the website --

22 THE WITNESS: Sorry. Go ahead.

23 MS. STEVENS: I said: "Object to form."

24 You can answer if you understood the question.

25 THE WITNESS: I can answer if I understood

1 the question? Is that what you said?

2 A. What was the question?

3 MS. STEVENS: Yes.

4 MR. HILTON: Dana, could you please read
5 back my last question?

6 THE REPORTER: Just a moment.

7 (The record was read as requested.)

8 A. So I had not been on the website since my last
9 change of address. So I am not sure what the process is
10 currently.

11 Q. (BY MR. HILTON) Were you aware of any changes
12 to the process?

13 A. I wasn't trying to keep up with the changes,
14 no.

15 Q. Do you know whether your wife took all the
16 actions necessary to register you both to vote?

17 A. Well, she changed --

18 MS. STEVENS: Object to form.

19 A. She changed our address.

20 MS. STEVENS: Sorry.

21 A. That's -- that's what she did. And we moved
22 counties.

23 Q. (BY MR. HILTON) Did you ever fill out a voter
24 registration application after moving counties?

25 A. No.

1 Q. I'm going to send you another file. This is
2 going to be Exhibit 3.

3 It's quite a bit larger than the others;
4 so whenever you're able to download it and pull it up on
5 your computer, let me know.

6 A. Okay. It's up.

7 (Exhibit 3 marked)

8 Q. (BY MR. HILTON) Do you recognize Exhibit 3?
9 And you can take all the time you need to look at it and
10 review it in its entirety.

11 A. I recognize what it is. I couldn't say that I
12 recognize it because I've been on it.

13 Q. What's your understanding of what it is?

14 A. For some reason, it's really wide on mine and
15 it's harder to see. Hold on.

16 The log-in page for the driver's license
17 website?

18 Q. Have you ever been to this page?

19 A. I would guess this is similar to the page I
20 logged onto in 2014.

21 Q. Do you know if this is the page that your wife
22 went to when she changed y'all's driver license
23 addresses when you moved to Houston?

24 A. I don't know what page she was on, but I do
25 know that we did get our licenses in the mail about, you

1 know, a month later or whatever.

2 Q. Let's turn to page 5 of Exhibit 3. Let me know
3 when you're there.

4 A. Okay. "Select Options." Is that what's at the
5 top?

6 Q. That's what's at the top. And then on the
7 right-hand side, there's a little -- a list that says
8 "Steps to Complete" and highlighted as No. 5, "Select
9 Options."

10 A. Okay. I see that.

11 Q. And do you see about halfway down the page, the
12 heading that says "Request of voter registration
13 application"?

14 A. Yes.

15 Q. And do you see that the option "yes" is checked
16 there?

17 A. Yes.

18 Q. And you see next to that where it says: "This
19 does not register you to vote"?

20 A. Yes.

21 Q. Sitting here today, what does that mean to you?

22 A. That I'm requesting a voter registration
23 application by clicking "yes."

24 Q. Do you know your -- if your wife went -- saw
25 this page when she was changing your driver licenses?

1 A. I don't -- I don't know what she saw.

2 Q. Do you think your wife, if she -- she got to
3 this page and selected "yes," that she would think
4 that -- that y'all would be registered to vote by
5 selecting this option?

6 A. Well, I would probably doubt it.

7 Q. Let's go to the last page of Exhibit 3.

8 A. Okay.

9 Q. You can let me know when you're there.

10 A. All right. "Request for Voter Registration
11 Applications"?

12 Q. Yes, sir. And at the very bottom, it says:
13 "You may request a postage-paid application by filling
14 out this form so that a voter registration application
15 can be mailed to you." Do you see that?

16 A. No, I don't see that. Is it on the left or
17 right or --

18 Q. It's -- it's the very last line on the last
19 page of Exhibit 3.

20 A. Oh, I -- okay, yeah. It's cut off on mine.
21 Hold on. It's the -- the -- for whatever reason, the
22 file is like twice as wide as my computer screen.

23 Q. Understood. It's -- it's hard for attorneys to
24 wrangle screenshots of web pages.

25 A. Oh, it's --

1 Q. I've not been able to do it so --

2 A. It's okay. It popped up on Internet Explorer;
3 so who knows what's really going on.

4 "You may request a postage-paid
5 application by filling out this form so that a voter
6 registration application can be mailed to you." Yes, I
7 do see that.

8 Q. Did you know that you could request a
9 postage-paid voter registration application to be mailed
10 to you?

11 A. No.

12 Q. Do you know if your wife did that when she was
13 updating your driver licenses online?

14 A. I do not know.

15 Q. Do you know if your wife ever navigated to this
16 page at the end of that driver license process?

17 A. No, sir.

18 Q. And you never requested a voter registration
19 application to be mailed to you?

20 A. No, sir.

21 Q. All right. I'm going to send one more exhibit
22 through the chat function on Zoom. This will be
23 Exhibit 4. Let me know when you have that file in front
24 of you.

25 A. Exhibit 24?

1 Q. Yes, sir. So it's Exhibit 4 for purposes of
2 this deposition. The first page of it says "Exhibit 24"
3 because this was attached to a file that your attorneys
4 made.

5 A. Okay.

6 Q. And the content begins on the second page of
7 what is going to be Exhibit 4 for the purposes of the
8 deposition.

9 A. Okay. I'm on it. I'm on the second page.

10 (Exhibit 4 marked)

11 Q. (BY MR. HILTON) Do you recognize this
12 document?

13 A. Yes.

14 Q. And what is it?

15 A. Declaration of Jarrod Stringer.

16 Q. And scrolling to the last page of this
17 document, is that your signature and date?

18 A. Yes, sir.

19 Q. So you signed this declaration?

20 A. Yes, sir.

21 Q. And it looks like this is a scanned version of
22 it or a picture of a physical document? Is that -- is
23 that correct?

24 A. Yes. I scanned it.

25 Q. And so did you print it first and then sign it

1 and then scan it?

2 A. Yes, sir.

3 Q. Okay. I want to go to Paragraph 11 of your
4 declaration.

5 A. Yes, sir. I'm there.

6 Q. Do you and your wife still plan to move
7 residences this year?

8 A. Yes.

9 Q. Have you given notice on your lease yet?

10 A. 60 days is required --

11 Q. Or do you have to give notice?

12 A. Yeah. We have to give 60 days' notice which
13 would be June 24.

14 Q. And you intend to do so?

15 A. Yes.

16 Q. Where would y'all move?

17 A. We are currently looking at different townhomes
18 in certain neighborhoods closer to my wife's job
19 potentially. We have been looking online, and I have
20 gone to a couple physically.

21 Q. Are y'all intending to buy or to rent again?

22 A. We were hoping to buy, but that probably is not
23 going to happen yet. So unfortunately we're going to --
24 we're going to do one more lease and then -- and then
25 look at buying.

1 Q. Yeah. My wife and I are in a similar boat. We
2 were hoping to buy something this year, and everything
3 is so uncertain now. It's hard to say.

4 A. Yeah. We actually got a call from our Realtor
5 yesterday which is -- she was checking on us to see
6 where we're at in that. So we had -- we had made
7 contact with her, I guess, this January and -- and with
8 the hope of buying in -- in August, but it -- it hasn't
9 moved as quickly and we had hoped.

10 Q. Is there any chance that y'all will renew it,
11 your lease at your current place?

12 A. No, sir. Pardon -- pardon the laughter, but we
13 moved -- we had to move so fast from San Antonio. We
14 had -- he wanted her to move the next day, her boss. We
15 got here in two weeks. I was still sick. We had --
16 we -- we -- first time I've ever rented without looking
17 at the place; so it was crazy.

18 Q. So -- and laughter is totally fine. I guess
19 you're laughing because it sounds like maybe
20 this current place hasn't been all you hoped it would
21 be?

22 A. Well, the -- the apartment itself is fine, but
23 the complex is in disrepair. It's in a pretty sad
24 state. I mean, there's not even any grass.

25 Q. And in Paragraph 12 of Exhibit 4, which is your

1 declaration, you say: "When I move to our new address,
2 I intend to use the DPS website to update my driver's
3 license address." Is that still true?

4 A. Yes, sir.

5 Q. And are you going to do that process this time,
6 or is your wife going to do that process?

7 A. I don't know.

8 Q. Will you register yourself to vote at your new
9 address?

10 MS. STEVENS: Objection, form.

11 A. I will --

12 MS. STEVENS: You can answer. Sorry.

13 A. Yes. I will change my address online and
14 will -- hopefully that will be sufficient with the, you
15 know, with my driver's license.

16 Q. (BY MR. HILTON) Will you follow the process
17 that is described through the online driver license
18 website in order to make sure that you're registered to
19 vote?

20 MS. STEVENS: Objection, form. You can
21 answer. Sorry. Every time -- it's fine to answer
22 unless I tell you otherwise.

23 A. I will do whatever I have to do to get
24 registered.

25 Q. (BY MR. HILTON) So let's go back to Exhibit 3

1 if you can.

2 A. Sure. I have a tab open.

3 Q. And I want to go to the second to last page.

4 A. All right.

5 Q. It's page 10, Exhibit 3.

6 A. Sure.

7 Q. Let me know when you're there.

8 A. It's "Driver's License, Renewal, Replacement"

9 and all that?

10 Q. Yep. And do you see a part in the -- a part of
11 this page in -- in red, in a red box kind of near the
12 top?

13 A. Yes.

14 Q. Can you read that for me, please?

15 A. "You are not registered to vote until you have
16 filled out the online application, printed it, and
17 mailed it to your local County Voter Registrar. Click
18 here to: Download a Voter Registration Application."

19 Q. And so what is -- strike that.

20 Will you follow this instruction and go
21 through that process if that's the process when you
22 move?

23 MS. STEVENS: Objection, form.

24 A. I can't say for sure.

25 Q. (BY MR. HILTON) And recall that we looked at

1 the website from the Secretary of State. It's the next
2 page of Exhibit 3 where it says that you can have a
3 postage-paid application mailed to you. Would you use
4 that process to register yourself to vote?

5 MS. STEVENS: Objection, form.

6 A. Possibly.

7 THE WITNESS: Sorry, Beth.

8 A. Possibly.

9 Q. (BY MR. HILTON) All right. Bear with me just
10 one second, Mr. Stringer. I'm looking at my notes and
11 seeing if there's anything else I have for you.

12 A. Yes, sir.

13 Q. All right. I appreciate your patience, but the
14 long pause means that I've looked at my notes and
15 determined there's not a whole lot left. So that's good
16 news.

17 A couple of just final questions: Have
18 you ever made any contributions to the Texas Civil
19 Rights Project?

20 A. No.

21 Q. Have you ever made contributions to any other
22 nonprofit organization?

23 A. Sure.

24 Q. Any that deal with voting rights or civil
25 rights?

1 A. Yes.

2 Q. And what are those organizations?

3 A. ACLU.

4 Q. Any others?

5 A. We are -- we are on -- I do, like, recurring
6 monthly donations; but I can't remember all of the
7 organizations names, to be honest.

8 Q. Have you ever posted anything on the Internet
9 or social media or anywhere else about this lawsuit?

10 A. No.

11 Q. Have you ever made any other statements to any
12 media or reporters about this lawsuit?

13 A. No.

14 Q. Any other written or recorded statements of any
15 kind about this case?

16 A. No, sir.

17 Q. All right. Well, I'll probably think of
18 something as soon as we're done; but I think that's all
19 I have. So I hope I've been -- I hope I've been
20 courteous and professional to you today?

21 A. Absolutely. I've enjoyed it.

22 Q. All right. I have as well. It was a pleasure
23 chatting with you.

24 A. Likewise.

25 MR. HILTON: We'll reserve any other

1 questions and any remaining time, but I think that's all
2 I have for now. So pass the witness.

3 MS. STEVENS: Great. We reserve our
4 questions; but just a note, Chris: We'll want to
5 designate the portions about the questions about, like,
6 contributions to various things and the political
7 questions. I know that we've got a process for that,
8 but I just wanted to note it for you now so it's not out
9 of the blue. But other than that, I think we're good.

10 MR. HILTON: Understood. I think we can
11 go off the record.

12 THE REPORTER: Before we go off the
13 record, you are having this transcribed, Mr. Hilton?

14 MR. HILTON: Yes, please.

15 THE REPORTER: And do you need a copy?

16 MS. STEVENS: Actually, I don't need a
17 copy, but we do want to read and sign.

18 THE REPORTER: Okay. So we're off the
19 record at 11:01 a.m.

20 (Deposition concluded at 11:01 a.m.)
21
22
23
24
25

REASON

[illegible]

1
2
3
4
5
6
7
8 I declare under penalty of perjury that the
9 foregoing is true and correct.
10

11 _____
12 JARROD STRINGER
13
14

15 SUBSCRIBED AND SWORN TO BEFORE ME, the undersigned
16 authority, by the witness, JARROD STRINGER, on this the
17 ____ day of _____, _____.
18

19 _____
20 NOTARY PUBLIC IN AND FOR
21 THE STATE OF _____
22

23 My Commission Expires: _____
24
25

1 STATE OF TEXAS
2 COUNTY OF MONTGOMERY

3 REPORTER'S CERTIFICATE

4 I, Dana Richardson, a Certified Shorthand Reporter
5 in and for the State of Texas, do certify that this
6 deposition transcript is a true record of the testimony
7 given by the witness named herein, after said witness
8 was duly sworn by me. The witness was requested to
9 review the deposition.

10 I further certify that I am neither attorney or
11 counsel for, related to, nor employed by any parties to
12 the action in which this testimony is taken and,
13 further, that I am not a relative or employee of any
14 counsel employed by the parties hereto or financially
15 interested in the action.

16 I further certify that the amount of time used by
17 each party at the deposition is as follows:

18 Mr. Christopher D. Hilton - 00:57

19 SUBSCRIBED AND SWORN TO under my hand and seal of
20 office on this the 1st day of May, 2020.

21 A handwritten signature in black ink that reads "Dana Richardson". The signature is written in a cursive, flowing style. Below the signature is a horizontal line.

22 Dana Richardson, RPR, TX CSR 5386
23 Expiration: 01/31/22
24 Integrity Legal Support Solutions
25 Firm Registration No. 528
PO Box 245
Manchaca, Texas 78652
(512) 320-8690
(512) 320-8692 (fax)